

## Danielle Brye

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**From:** Wendell Holmes Jr. [REDACTED]  
**Sent:** Monday, March 10, 2025 1:11 PM  
**To:** KJ Jones  
**Cc:** Joseph Weeks; Danielle Brye; Peter Shelton; Saam Ghiaasiaan  
**Subject:** Re: Soto v. Holmes - Case No. 1:24-cv-02911-SDG- Request for conference regarding discovery dispute  
**Attachments:** MOTION FOR SPECIAL APPEARANCE .docx; AFFIDAVIT DENYING CLAIMS.docx; MOTION TO DISMISS (1).docx; AFFIDAVIT IN SUPPORT OF MOTION TO DISMISS.docx  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

### CAUTION - EXTERNAL:

Good afternoon! I informed Mr. Weeks 2-3 different times last week that I would not be available today March 10th, so he was very aware of this. Mr. Weeks sent me a list of dates that he would be available to meet up until the 17th. I replied letting him know that I was dealing with some health issues and that I would not be available anytime soon but because he insisted I agreed to meet on March 17th, one week from today. He then proceeds to respond back saying all of sudden he is busy on the 17th and that he could meet on the 12th or 13th. I then informed Mr. Weeks that those dates do not work for me, and if those dates were the only options for him then he should have stated that from the beginning. I've tried to work with him but he instead is coming off as a bully trying to force me to jump at his every call. I'm really exhausted with all of the harassment from Mr. Weeks, with the constant emails and letters coming in the mail. Below are attached documents that I submitted to the court today. Thank you and have a blessed day.

On Mon, Mar 10, 2025 at 11:38 AM KJ Jones [REDACTED] wrote:

Thank you for the update, Mr. Weeks. We will let you know how Judge Grimberg would like you to proceed.

KJ Jones

Career Law Clerk, Hon. Steven D. Grimberg

United States District Court, Northern District of Georgia

[REDACTED]

[REDACTED]

[REDACTED]

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From: Joseph Weeks [REDACTED]  
Sent: Monday, March 10, 2025 10:22 AM  
To: Danielle Brye [REDACTED]; KJ Jones [REDACTED] >  
Cc: Wendell Holmes Jr. [REDACTED]; Peter Shelton <[REDACTED]> Saam  
Ghiaasiaan [REDACTED]  
Subject: Soto v. Holmes - Case No. 1:24-cv-02911-SDG- Request for conference regarding discovery dispute

**CAUTION - EXTERNAL:**

Ms. Byrd and Ms. Jones:

Plaintiff requests a conference with the Court regarding a discovery dispute pursuant to page 16 of the Standing Order. Defendant has failed to respond to written discovery and failed to appear at his deposition this morning.

Plaintiff served Interrogatories, Requests for Admission, and Request for Production of Documents on Defendant on February 5, 2025. His responses were due no later than March 7, 2025. To date, Plaintiff has not received any responses to the discovery. Plaintiff sent an email on 3/8/25 requesting a conference with Defendant this morning to discuss the discovery dispute pursuant to the standing order. That email is attached to this email. Plaintiff has received no response to this email.

Additionally, on February 19th Plaintiff noticed the deposition of the Defendant for this morning. Defendant was served with the notice on February 19th by email and US Mail as indicated in the LR 26.3 Certificate of Service of Discovery. [DE 18]. Defendant did not respond until late on March 3, requesting to reschedule the deposition to May 26. I replied the next day, explaining that discovery closes on March 17 and that I could not agree to cancel the March 10 deposition without securing a mutually agreeable date within the discovery period. I asked him to propose a few dates between March 6 and March 17, but he only suggested March 17, a date on which I have a conflict. I offered March 13 or 14, but he refused to cooperate in my attempts to accommodate his request to reschedule the deposition. I sent an email to the Court about this issue on March 6th. KJ Jones responded to that email asking Defendant Holmes to email a response by 3/7/25. I have not received a response, so Defendant has either not responded or has failed to cc me on any response that he may have made. Defendant did send the attached email in response to my office emailing him the confirmation of the Court Reporter for this morning, so it is clear that he was aware that he was supposed to appear and that the deposition was going forward as noticed at 10 am this morning. The Court reporter and I waited until 10:15. Defendant did not appear.

I would like to file a Motion pursuant to Rule 37. Please advise.

Thank you,

Joseph Weeks

Joseph W. Weeks  
Attorney at Law  
McNally Weeks

**PLEASE NOTE OUR NEW ADDRESS:**

125 Clairemont Ave.  
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Decatur, Georgia 30030  
[404-373-3131](tel:404-373-3131) phone  
[404-373-7286](tel:404-373-7286) fax

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